

LISA REYNOLDS-BARBOUNIS

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PENNSYLVANIA

- - -

LISA BARBOUNIS : CIVIL ACTION NO.
: 2:19-cv-05030-JDW
vs. :
:
THE MIDDLE EAST FORUM, :
and GREGG ROMAN :
(individually) :

- - -

WEDNESDAY, NOVEMBER 4, 2020

- - -

VIDEOTAPE DEPOSITION OF LISA
REYNOLDS-BARBOUNIS, taken pursuant to
notice, was held by and between all parties
present via communication technology using
Zoom, commencing at 11:03 a.m., before
Kimberly S. Gordon, a Registered
Professional Reporter, Certified Court
Reporter and Notary Public.

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1 THE WITNESS: No, I want to.

2 MR. CARSON: Lisa, you don't
3 have to.

4 THE WITNESS: I never cheated
5 on my husband or had an affair or
6 anything. This is what happened, The
7 Middle East Forum beat me down. They
8 beat me down so bad, so bad. I never
9 so much just looked at another man,
10 okay, until The Middle East Forum.

11 And did you know that sexual
12 abuse survivors and sexual assault
13 victims and sexual people that have
14 been attacked by sexual predators,
15 like Gregg Roman, one in four have
16 extra things like what I do, right.
17 It's a classic trauma symptom. So
18 don't you go and start blaming my sex
19 life on what happened to me.

20 The only reason that I had sex
21 with anybody was because The Middle
22 East Forum damaged my freakin'
23 emotional state. So please, I don't
24 want to go there. This is The Middle

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1 East Forum's -- The Middle East Forum
2 did it all. They beat me down so
3 bad, so badly that I just needed, I
4 needed to feel happy, to feel good,
5 to feel proud of myself.

6 Don't you dare try to use my
7 sexual life or my sexual anything as
8 a reason. It wouldn't have even
9 happened had it not been for The
10 Middle East Forum, none of this, my
11 marriage, my dating life, none of it.
12 It's all The Middle East Forum's
13 fault. Those people are predators.

14 MR. CARSON: So, Jon,
15 irrespective of what you might have
16 read in medical records, --

17 MR. CAVALIER: Well, Seth,
18 irrespective of the records, it's
19 clearly relevant now.

20 MR. CARSON: It's not a license
21 to ask her about every guy she's ever
22 had sex with. It's not a license to
23 ask her about every guy she's ever
24 spoken to and then ask her if she's

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1 A. Oh, yes.

2 Q. Okay. How did you find that out?

3 A. Jazmine started harassing me.

4 Q. Okay. Harassing you about what?

5 A. Danny.

6 Q. And your relationship with him?

7 A. Yes.

8 Q. How was she harassing you?

9 A. She would call me names, call -- like
10 make fake accounts on Twitter, on Instagram,
11 on Facebook. She was incessant. She would
12 call me all the time. She would message me.
13 She would message Vasili. She would -- she
14 was a psycho. She was just crazy.

15 Q. She reached out to your husband?

16 A. Yes.

17 Q. How often would this occur? I mean
18 was it a daily thing, a weekly thing?

19 A. Daily and weekly. Like she would go
20 on a rant for like, you know, a couple days
21 and then she would give it a rest for a week
22 and then she'd start up again. I mean she
23 was doing this for two years, even when I
24 tried to be nice to her.

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1 I tried to be so nice to that girl.
2 I told her to get an education. I would help
3 her find a school there, you know, grant
4 programs that would like help her get
5 educated so she wouldn't be in this situation
6 that she was.

7 She cried to me. She talked to me
8 about her mom. She was crazy.

9 Q. That seems like it would be pretty
10 upsetting to you?

11 MR. CARSON: Objection.

12 THE WITNESS: Why would it be
13 upsetting? The only part that was
14 upsetting to me is when --

15 MR. CARSON: Lisa, --

16 THE WITNESS: Sorry.

17 MR. CARSON: Objection. Facts
18 not in evidence. Object to form.
19 Argumentative. You can answer.

20 MR. CAVALIER: I'll rephrase
21 the question.

22 BY MR. CAVALIER:

23 Q. You said she was harassing you for
24 two straight years. Did that upset you?

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1 A. It was annoying.

2 Q. Did it upset you?

3 MR. CARSON: Objection. Asked
4 and answered.

5 THE WITNESS: It was annoying.
6 That's all it was, annoying.

7 BY MR. CAVALIER:

8 Q. Was it a minor annoyance?

9 MR. CARSON: Objection. Asked
10 --

11 THE WITNESS: Minor.

12 BY MR. CAVALIER:

13 Q. Was it a minor annoyance or a major
14 annoyance?

15 MR. CARSON: Objection.

16 THE WITNESS: Minor annoyance.

17 BY MR. CAVALIER:

18 Q. So how did you respond to that minor
19 annoyance?

20 A. In the time, there were times where I
21 yelled and screamed at her. There were times
22 where I ignored her. There were times when I
23 blocked her. There were times when -- there
24 were all different times. There were times

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1 Q. Do you recognize this statement?

2 A. Yes. I said that.

3 Q. That doesn't seem to me to be the
4 kind of thing that somebody would say to
5 somebody who was being a minor annoyance, do
6 you agree?

7 MR. CARSON: Objection to the
8 mischaracterization of my client's
9 testimony. You can answer. Object
10 to form. Argumentative.

11 THE WITNESS: When we say
12 "minor annoyance", okay, a minor
13 annoyance is something that could be
14 I broke my foot, and in the time that
15 I broke my foot, it was extremely
16 painful. Is it a minor annoyance in
17 the grand scheme of life, yes.
18 However, it doesn't mean that I
19 wasn't upset at the time.

20 So she's a, in the grand scheme
21 of my life, she is a minor annoyance.

22 BY MR. CAVALIER:

23 Q. Do you see this as a rather extreme
24 reaction to that kind of a minor annoyance?

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1 A. Correct.

2 Q. You stated to your, you told the
3 doctor during the consultation that you've
4 experienced mental difficulties in the last
5 several years and part due to the work
6 stressors associated with the instant case as
7 well as financial difficulties on the part of
8 her husband.

9 A. That's true.

10 Q. Tell me about the financial
11 difficulties that you're having.

12 A. So -- my husband, especially I love
13 when he tries hard, when we got married,
14 apparently he got audited for years prior, I
15 think they were 2006, seven and eight or
16 something like to that, to our marriage. And
17 when he got audited, he kind of like didn't
18 tell me he was trying to like do, handle it
19 on his own or he was supposed to -- Vasili is
20 not like the most disciplined, regimented
21 person, and he like didn't follow-up or
22 didn't do what he was supposed to do with
23 that. And so then he started saying, "Well,
24 I'll just pay it", right. He was going to